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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

MARIA TSATAS, an individual; LEONIDAS VALKANAS, as trustee of the KEET TRUST dated August 1, 2015; RAYMOND BARAZ, an individual; PASCAL ABDALLAH, an individual; JIMMY TSOUTSOURAS, an individual; FOTINI VENETIS, an individual; NICHOLAS TSOUTSOURAS, an individual; CONNIE TSOUTSOURAS, an individual; RAYMONDE KANHA, an individual; ALFRED BEKHIT, an individual; JACQUEZ ELBAZ, an individual; MARTINE BENEZRA, an individual; JAMES P. CARROLL, an individual; DAVID CHIN, an individual; JENNIFER MILLS, an individual; PAUL SUBLETT, an individual; ANDREW SUBLETT, an individual; MANOLIS KOSTAKIS, an individual; ESTHER GEORGAKOPOULOS, an individual; EVAGELIA KOSTAKIS, an individual; DENIS PARSONS, an individual; SOFIA KARDARAS, an individual; JIMMY ASMAKLIS, an individual; CORRADINO

CASE NO.: 2:20-cv-2045-RFB-BNW

**STIPULATION TO EXTEND TIME TO  
FILE RESPONSES AND REPLY BRIEFS  
TO DEFENDANTS' MOTION FOR CASE  
DISPOSITIVE SANCTIONS (ECF NO. 242)  
BY 7 DAYS**

**(First Request)**

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1 GALUPPO, an individual; DENIS KOPITAS,  
2 an individual; TERRY TSATAS, an  
individual; GEORGE TSATAS, an individual;  
3 PANAGIOTA TSATAS, an individual;  
OURANIA TSATAS, an individual;  
4 KIRIAKOS PRIMBAS, an individual;  
EVANTHIA PRIMBAS, an individual;  
PATRICK AYOUB, an individual; MICHAEL  
5 BESCEC, an individual; ERNEST LEBOEUF,  
an individual; PHILIPPE LEGAULT, an  
individual; EFTIHIOS LITSAKIS, an  
6 individual; GIOVANNI MONCADA, an  
individual; MARC RIEL, an individual;  
7 JARADEH SALIM, an individual; HANI  
HAMAM, an individual; CONSTANTIN  
8 ZISSIS, an individual; BESSIE PEPPAS, an  
individual; NIKI PALIOVRAKAS, an  
9 individual,

10 Plaintiffs,

11 v.

12 AIRBORNE WIRELESS NETWORK, INC., a  
Nevada Corporation; MICHAEL J. WARREN,  
13 an individual; J. EDWARD DANIELS, an  
individual; MARIUS DE MOS, an individual;  
14 JASON DE MOS, an individual; ROBERT  
BRUCE HARRIS, an individual; KELLY  
15 KABILAFKAS, an individual; and  
APCENTIVE, INC., a Nevada Corporation,

16 Defendants.  
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**STIPULATED REQUEST FOR EXTENSION OF DEADLINE TO FILE RESPONSE**  
**AND REPLY BRIEFS TO ECF NO. 242**

Plaintiffs (as listed in the above caption, with the exception of the ten named plaintiffs for whom the Court granted a Motion to Withdraw (ECF No. 219) and for which there is a pending unopposed request to dismiss them (ECF No. 236)) and Defendants (as listed in the above caption, with the exception of the deceased defendant Marius de Mos) (together, the “Parties”), by and through their undersigned counsel of record, submit this Stipulation to Extend Time to File Responses and Replies pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1.

WHEREAS, on March 7, 2024, Defendants filed a Motion for Case Dispositive Sanctions for Perjury and Other Misconduct Against All Plaintiffs, or in the Alternative Against Plaintiff Leonidas Valkanas, as Trustee of the Keet Trust (ECF No. 242).

WHEREAS, Plaintiffs’ Response to Defendants’ Motion for Case Dispositive Sanctions is currently due on March 21, 2024 and Defendants’ Reply Brief is currently due on March 28, 2024.

WHEREAS, the Parties have met and conferred about material that was filed in the Declaration of Peter L. Chasey, Esq. (ECF No. 242-1) that Plaintiffs designated as “CONFIDENTIAL” pursuant to the August 9, 2021 Stipulated Protective Order and Confidentiality Agreement (ECF No. 64).

WHEREAS, on March 14, 2024, the Parties reached a stipulation to strike (ECF No. 245) the Declaration of Peter L. Chasey, Esq. (ECF No. 242-1) and replace it with the Amended Declaration of Peter L. Chasey, Esq. (ECF No. 243-1), filed on March 13, 2024 and which redacted the information Plaintiffs designated as “CONFIDENTIAL.”

WHEREAS, the meet and confer process regarding the “CONFIDENTIAL” material took time away from Plaintiffs’ ability to oppose Defendants’ Motion (ECF No. 242) on the merits.

WHEREAS, the Parties agreed that Plaintiffs could have an additional week to respond to Defendants’ Motion (ECF No. 242), without prejudice to requesting an additional week, if needed.

WHEREAS, this is the Parties’ first request for an extension of the deadlines to file a Response and Reply Brief to Defendants’ Motion (ECF No. 242).

THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by

and through their respective attorneys of record, that, for good cause, the deadlines to file a Response and Reply Brief to Defendants' Motion (ECF No. 242) is extended by one week as follows:

Current deadline to file Response to Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	March 21, 2024
<b>New deadline to file Response to Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)</b>	<b>March 28, 2024</b>
Current deadline to file Replies re Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)	March 28, 2024
<b>New deadline to file Replies re Defendants' Motion for Case Dispositive Sanctions (ECF No. 242)</b>	<b>April 4, 2024</b>

**IT IS SO STIPULATED.**

DATED: March 15, 2024

Respectfully submitted.

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By: /s/ Andrew B. Goodman  
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DATED: March 15, 2024

Respectfully submitted.

CHASEY LAW OFFICES  
LAW OFFICES OF S. DON BENNION

By: /s/ Peter Chasey  
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*Attorneys for Defendants*

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: 3/18/2024

**CERTIFICATE OF SERVICE**

I, Amanda McGill, declare that I am employed by the law firm of Novian & Novian, LLP, a citizen of the United States of America, a resident of the state of California, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On March 15, 2024, I caused a true and correct copy of the foregoing document to be served on the person(s) listed below in the manner indicated:

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☒ Via CM/ECF

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DATED March 15, 2024.

/s/ Amanda McGill

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